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May 26, 2021

**DELIVERED VIA ECF**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007

**SO ORDERED:**

George B. Daniels  
George B. Daniels, U.S.D.J.

Dated: MAY 27 2021

**Case Title:** *Lixenberg v. Oath Inc., et al.*; 1:20-cv-07176-GBD-RWL  
**Re:** Request to Extend Dismissal Deadline

Your Honor:

As you know, our office represents Plaintiff Dana Ruth Lixenberg (“Lixenberg”) in this action. We write to respectfully request an extension of the deadline for dismissal. Lixenberg requested consent from Defendant Oath, Inc., but no response has been received yet. On April 22, 2021, the parties filed a Notice of Settlement with the court indicating that they intended to file a stipulation of dismissal with prejudice within 30 days. (Dkt. #24.) The Court then issued an order of discontinuance directing the parties to either submit a stipulation of dismissal or a status report within thirty days of the Court’s order. (Dkt. #25.)

The parties have fully executed the settlement agreement but need additional time to discharge certain obligations pursuant to the agreement. The parties respectfully request that the deadline to file the stipulation of dismissal with prejudice be extended by an additional 14 days, from May 26 to June 9, to allow time for this. This is the first request for an extension of the deadline for dismissal with prejudice.

We thank Your Honor for your time and consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs  
Laura M. Zaharia  
DONIGER / BURROUGHS  
For the Plaintiff